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10 IN THE UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,  
13 Plaintiff,  
14 v.  
15 KEVIN DAIL MEADORS,  
16 Defendant.

CASE NO. 2:24-CR-00292 JAM  
STIPULATION AND PROTECTIVE ORDER  
REGARDING DISCOVERY

17  
18 STIPULATION

19 Pursuant to 18 U.S.C. §§ 3509(d), (m), and 3771(a)(8) and Federal Rule of Criminal Procedure  
20 16(d), the undersigned parties hereby stipulate and agree, and respectfully request that the Court order  
21 that:

22 1. A portion of the discovery in this case contains personal, identifying information  
23 regarding third parties (adults and minors) and victims, including but not limited to their names, physical  
24 descriptions, telephone numbers and/or residential addresses.

25 2. This Order pertains to all discovery provided to or made available to defense counsel that  
26 contains the name of, or other personally identifying information about, a third-party, identified victim,  
27 or minor witness (hereafter, collectively known as “protected discovery”). Such protected discovery  
28 shall be identified as protected by the government when it is produced to the defense, in a cover letter, or

1 by a specially-designated Bates range, or through an e-mail message.

2       3. Defense counsel shall not disclose any of the protected discovery or its contents directly  
3 or indirectly to any person other than the defendant, potential witnesses that they are interviewing or  
4 preparing for trial, counsel for those witnesses, or anyone employed by defense counsel (such as  
5 attorneys, paralegals, secretaries, experts, investigators, and law clerks) in connection with the  
6 representation of the defendant in this criminal case.

7       4. The defendant may view the protected discovery in the presence of defense counsel  
8 and/or a defense investigator, but may not retain a copy or otherwise disseminate the contents.

9       5. The protected discovery and information therein may only be used in connection with the  
10 litigation of this case and for no other purpose.

11       6. If there is a substitution of counsel prior to final disposition of the case, new counsel of  
12 record must join this Protective Order before any protected discovery may be transferred from the  
13 undersigned defense counsel to the new defense counsel. New defense counsel then will become defense  
14 counsel for purposes of this Order, become the custodian of the protected discovery, and shall then  
15 become responsible, upon conclusion of appellate and post-conviction proceedings, for complying with  
16 the provisions set forth in Paragraph 12 below. All defense counsel, whether current or past counsel, are  
17 at all times subject to the Order and are not relieved by termination of representation or conclusion of  
18 the prosecution.

19       7. Defense counsel will store the protected discovery in a secure place, such as a locked  
20 office, and shall use reasonable care to ensure that it is not disclosed to third persons in violation of this  
21 agreement. To the extent any of the protected discovery, or any copies or reproductions thereof, are  
22 stored electronically the protected discovery shall be stored on a password-protected or encrypted  
23 storage medium or device. Encryption keys shall be stored securely and not written on the storage media  
24 they unlock.

25       8. If defense counsel makes, or causes to be made, any further copies of any of the protected  
26 discovery, defense counsel will ensure that the following notation is physically written or inscribed on  
27 each copy made, if the confidentiality of the documents is otherwise not already present on the copied  
28 file(s) or hard copies: "CONFIDENTIAL – May Not Be Disseminated Except in Accordance With

1 Court Protective Order.”

2       9. If defense counsel releases custody of any of the protected discovery, or authorized  
3 copies thereof, to any person described in paragraph three, defense counsel shall first provide such  
4 recipients with copies of this Order. The parties agree that defense counsel, defense investigators and  
5 support staff shall not provide the protected discovery to the defendant or any other witness or copies of  
6 the protected discovery, except for the limited situations identified in this Order.

7       10. Defense counsel shall advise the government counsel of any subpoenas, document  
8 requests or claims for access to the protected discovery by third parties if defense counsel is considering  
9 disseminating any of the protected discovery to a third party so that the government may take action to  
10 resist or comply with such demands as it may deem appropriate.

11       11. Defense counsel shall be responsible for advising the defendant, or his/her client, his/her  
12 employees and other members of the defense team, and defense witnesses of the contents of this Order.  
13 Defense counsel shall not provide or make available to any person described in paragraph three the  
14 protected discovery until that individual has been provided a copy of this Order by defense counsel.

15       12. If it becomes necessary to refer to an identified victim or minor witness during any public  
16 court proceeding or in a public court filing, the parties shall refer to them as they are in other pleadings  
17 in this matter, e.g., “MINOR VICTIM 1,” or by the first and last initials of the identified victim or  
18 witness.

19       13. Upon the final disposition of the case, including exhaustion of direct and collateral  
20 appellate proceedings, defense counsel shall return the protected discovery to the government, or certify  
21 in writing that the protected discovery has been destroyed, or, if defense counsel seeks to maintain the  
22 protected discovery in the defense counsel’s files beyond final disposition of the case, seek modification  
23 of this provision from the Court. If any protected discovery is used as defense exhibits, they shall be  
24 returned to the government along with the other protected discovery upon the final disposition of the  
25 case, and stored with the government exhibits so long as those are required to be maintained.

26       14. Nothing in this Order shall preclude a party from seeking a more restrictive protective  
27 order or other court order with regard to particular discovery items.

28       15. Defense counsel reserves the right to file objections with the Court concerning the

1 protected status of any material produced by the government, and to seek a less restrictive protective  
2 order, including an order requiring redactions in lieu of more restrictive measures, to ensure the  
3 defendant has the proper level of access to such material in preparing his defense. The contested  
4 protected materials shall be submitted in camera or under seal to the Court for evaluation, not publicly  
5 filed.

6 Dated: November 14, 2024

PHILLIP A. TALBERT  
United States Attorney

7 /s/ SHEA J. KENNY  
NCHEKUBE ONYIMA  
Special Assistant United States Attorney  
8 SHEA J. KENNY  
Assistant United States Attorney

9 Dated: November 14, 2024

10 /s/ ADAM T. WEINER  
ADAM T. WEINER  
Counsel for Defendant  
11 KEVIN DAIL MEADORS

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13  
14 [PROPOSED] ORDER

15 By agreement of the parties, and good cause appearing, the Court hereby adopts the stipulation  
16 and the terms contained therein. IT IS SO ORDERED.

17 DATED: November 14, 2024

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22 ALLISON CLAIRE  
23 UNITED STATES MAGISTRATE JUDGE  
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